

**Before the
FEDERAL COMMUNICATIONS COMMISSION
Washington, D.C.**

In the Matter of)	
)	
Informal Request for Certification)	
To Coordinate the Power Radio Service,)	RM No. 10687
Railroad Radio Service, and Automobile)	
Emergency Radio Service Under Part 90)	
of the Commission's Rules)	

**OPPOSITION OF
BURLINGTON NORTHERN AND SANTA FE RAILWAY COMPANY**

The Burlington Northern and Santa Fe Railway Company ("BNSF") hereby wishes to express its opposition to the petition of the Industrial Telecommunications Association ("ITA") to become a certified frequency coordinator for the Railroad Radio Service spectrum.

BNSF operates over 30,000 miles of track in 28 states of the western United States. Much of this track supports the movement of trains and equipment that operate on other railroads as well. This network is coordinated with other railroad radio networks as to assignment of channels and type of usage to insure that maximum benefit is realized from the use of the spectrum assigned for rail operations. These operations also require that highly interoperable radio communications be available at all times to insure that safety is not compromised. The net result is an interoperable railroad radio network that supports not only the major North American railroads but a multitude of small rail operations that interact with them on a daily basis. The introduction of additional coordinators, as proposed in the ITA petition, would exacerbate an

already difficult process of maintaining safe and reliable operations in a highly interactive radio environment.

The combined railroad radio networks have been supporting specialized, highly interoperable operations for at least three decades. During that time specialized radio uses have developed that are vital to the safe and efficient operation of the railroad business throughout the U.S. The railroad frequency coordinator limits the safety exposure of operations by maintaining a high degree of sensitivity to the implications and special requirements of the various types of railroad radio uses for maintaining safe operations and by incorporating that knowledge into the management of the various railroad frequency bands. This contribution to the railroad industry's operations would be compromised without maintaining and applying this significant knowledge base. The FCC's Second R&O on frequency assignment policy (PR Docket No. 92-235) states *"To ensure that such communications are protected, we will require, as suggested by AAR, applicants for frequencies that are currently allocated to certain radio services where radio is often used for critical public safety communications to go through the current recognized coordinator. In this way, critical communications capabilities can be protected by the coordinator who is intimately familiar with the use of these frequencies"*. Nothing has changed regarding the critical nature of railroad communications and the ITA petition does not address or appear to understand these issues and should be rejected.

The railroad radio networks operating in Canada and the United States share common frequency plans for radio channels in the 160 MHz, 450 MHz and 900 MHz bands. The radio networks of railroads in both the United States and Canada provide interoperable radio communications that support extensive near-border and cross-border traffic. The Radio Association of Canada (RAC) and the Association of American Railroads (AAR) perform the frequency coordination function for channels used, respectively, in Canada and the United States. The AAR and RAC coordinators cooperate to manage the frequency plans to insure

cross border interoperability and compatibility is maintained and their close relationship reduces conflict and improves the time required to resolve cross border issues. Introducing additional coordinators would considerably complicate the international coordination process and therefore BNSF opposes the ITA petition.


The introduction of additional coordinators would significantly degrade the ability of Canadian and U.S railroads to accomplish an orderly migration to narrowband as mandated by the FCC in its "refarming" decision. Industry Canada using a similar proceeding has mandated rechannelization of the land mobile bands in Canada. This migration must be coordinated by railroads on both sides of the border, and will require close cooperation by railroad radio users in Canada and the United States to achieve success. The introduction of additional coordinators into the process would severely compromise the cross border migration process and therefore the ITA petition should be rejected.

The transition to narrowband (12.5KHz) radios in the railroad interoperable environment is considerably more complicated than the replacement of the radio would suggest. The huge numbers of radios and the possibility of safety implications of degraded radio transmissions during a transition urge a considerable amount of caution. The present plan anticipates the conversion to dual mode (25KHz and 12.5KHz) of all interoperable mobile radios throughout the industry before transition on any territory can be accomplished safely. Even with that hurdle accomplished the transition must be undertaken with notification and coordination between all parties with extensive participation by the frequency coordinator as the networks must continue to make their normal adjustments during the transition. The success of the railroad industry's migration to narrowband will be highly influenced by our ability to interface with each other and a coordinator with extensive railroad operational experience. Additional coordinators would unnecessarily exacerbate this safety critical process and the ITA petition should be rejected for that reason as well.

In conclusion, a frequency coordinator without intimate knowledge of railroad operations or railroad communications requirements performing frequency coordination for railroad mobile radio channels will inevitably result in coordination decisions that compromise the performance of mobile radio links. Radio links are critical to reducing the safety exposure of railroad operations and the increased safety exposure created by underperforming radio links would certainly not be in the public interest. Accordingly, for the reasons set forth in this opposition, BNSF urges the Commission to deny ITA's request to become a certified frequency coordinator for the Railroad Radio Service spectrum.

Respectfully submitted,

BURLINGTON NORTHERN AND SANTA FE
RAILWAY COMPANY

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